

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

BRUCE T. MORGAN, an individual, and  
BRIAN P. MERUCCI, an individual,

Plaintiffs

Case No. 1:14-cv-00632

v.

Hon. Gordon J. Quist

RICK SNYDER, in his official capacity as  
the Governor of the State of Michigan, and  
MARY HOLLINRAKE, in her official  
capacity as the County Clerk and Register  
of Kent County, Michigan,

Defendants.

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**PLAINTIFFS' BRIEF IN SUPPORT OF MOTION FOR ATTORNEY'S FEES AND  
COSTS**

Plaintiffs Bruce T. Morgan and Brian P. Merucci, by and through their attorneys, Rhoades McKee PC, submit their Motion for Attorney's Fees and Costs in response to the Order regarding Mootness and Attorney Fees dated October 8, 2015 (Doc. No. 42), in which the Court requested a statement of attorney's fees incurred in this case, including counsel's hourly rate, an itemized description of the work performed in this case, and a statement of the costs incurred. Plaintiffs rely upon 42 U.S.C. § 1988 and Federal Rule of Civil Procedure 54(d)(1) as authority for seeking payment of their attorney's fees and costs by Defendant Rick Snyder.

Respectfully submitted,

RHOADES McKEE  
Attorneys for Plaintiffs

By: /s/ Stephanie D. Myott  
Stephanie D. Myott (P76697)